

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JERMICHAEL BROWN, JR.,

Case No. 1:25-cv-442

Plaintiff,

v.

Hon. Jane M. Beckering

MUSKEGON RIVER YOUTH HOME,
LLC, et al.,

Defendants.

**STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFF TO RESPOND TO
DEFENDANTS MECOSTA-OSCEOLA INTERMEDIATE SCHOOL DISTRICT AND
MECOSTA-OSCEOLA INTERMEDIATE SCHOOL DISTRICT BOARD OF
EDUCATION'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Plaintiff and Defendants that the deadline for the Plaintiff to file a response to Defendants Mecosta-Osceola Intermediate School District Mecosta-Osceola Intermediate School District Board of Education's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6) (ECF No. 17) is extended from Wednesday, July 23, 2025, to Tuesday, September 2, 2025.

Plaintiff respectfully requests this additional time for the following reasons. Attorney Cornish's twin daughters passed away within the last month and he is recently returning to work after an extended bereavement leave. Attorney Cornish is lead counsel in this matter. Attorney Abdnour agreed to serve as local counsel to assist Attorney Cornish in filing the Complaint before the statute of limitations ran while he awaited approval of his application for admission to this Court, but Attorney Abdnour has no specific knowledge of the case.

No Party will be prejudiced by adjourning the hearing and extending the deadlines in this matter and Defendants Mecosta-Osceola Intermediate School District Mecosta-Osceola Intermediate School District Board of Education consent the proposed extension.

IT IS SO STIPULATED on July 23, 2025.

s/ Elizabeth K. Abdnour

Elizabeth K. Abdnour (P78203)
Abdnour Weiker, LLP
325 E. Grand River Ave., Ste. 250
East Lansing, MI 48823
Phone: (517) 994-1776
Email: liz@education-rights.com

David Wesley Cornish
Cornerstone Legal Group, LLC
230 South Broad Street, 17th Floor
Philadelphia, PA 19102
Phone: 888-313-1385
Email: dwesley24@gmail.com

s/ Kailen C. Piper with permission

Gregory W. Mair (P67465)
Kailen C. Piper (P82865)
O'Neill Wallace & Doyle PC
300 St. Andrews Rd., Ste. 302
Saginaw, MI 48638
Phone: (989) 790-0960
Email: gmair@owdpc.com
Email: kpiper@owdpc.com

IT IS SO ORDERED.

Hon. Jane M. Beckering
U.S. District Court Judge

Dated: _____

CERTIFICATE OF SERVICE

I certify that on July 23, 2025, I filed this document by use of this Court's ECF system, which will serve copies to the Clerk of Courts and all counsel of record.

s/ Elizabeth K. Abdnour